

Response to 'Tackling Overcrowding in England', consultation paper by the Department for Communities and Local Government, September 2006

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'Increasing housing supply and reducing overcrowding will be priorities for this Government.'

The remit of this consultation paper ostensibly concerned with 'tackling overcrowding' is so curtailed by the unspoken premise of 'sustainability', and the need to work within 'available resources' that any hope of resolving the problem of overcrowded housing is denied at the outset.

Early on the scene is set, 'There is no point raising aspirations we cannot meet'. The Future Cities Project would like to ask what the 'point' is of consulting on, or indeed responding to, a discussion paper that has such low expectations of its capacity to 'tackle overcrowding'?

For instance, despite declaring 'We will raise the supply of larger homes', it is immediately apparent that you will do nothing of the sort. As the next sentence explains, you will increase such units only *as a proportion* of social housing already proposed for London i.e. at the expense of other builds. There is no net increase in housing at all. Similarly,

- You want to 'encourage mobility in the social sector to help free up under-occupied stock in higher demand areas' (and)
- Support the London Housing Strategy Delivery Plan target to 'reduce the proportion of private sector homes empty for more than six months'.

This is not only counter to the thrust of the sustainable communities agenda that seeks to *decrease* mobility (which would be a welcome shift if it were less cynically employed); but it also exhibits the parochial outlook and low horizons adopted throughout by the authors of this paper.

These are mean spirited attacks that cross an important line by seeking to dictate private decisions in the name of public policy; and that also barely conceal an infamous failure on the part of government to build enough houses to meet glaring social need. This is not housing policy it is a dispersal scheme.

The discussion paper veers worryingly between housing and family policy. Family breakdown and domestic violence may well be *associated with* poor housing but that is an argument for more and better quality housing, not for wondering out loud how you might intervene in people's lives. This is particularly

worrying for those of us who distrust state intervention and the damage it does, ironically, to notions of community and relations of trust within and without families. Especially as it resonates with a widely held view promoted by favoured lobbyists and in a number of government initiatives (often on the basis of dubious evidence), that incidents of abuse and violence in the home are on the increase. This represents an unprecedented remit for intervention in family life.

It also seems to be part of a broader therapeutic turn in the model of governance adopted by the government in a number of policy areas, in the name of attending to people's 'well-being' or playing off one set of 'vulnerable' or 'disadvantaged' clients against another. For instance you claim that:

- Health, stress, depression and education are all legitimate areas of concern for a policy ostensibly concerned with reducing overcrowded housing.
- And that policy on overcrowding must not 'displace problems' onto the homeless or to those living in temporary accommodation.

But these conditions and circumstances have much in common as effects (or side-effects) of insufficient housing on the one hand; and a degraded political culture that seeks to make connections with people through their very individual experiences of vulnerability, distress and disadvantage, on the other. This is both an evasion of the responsibility for addressing 'overcrowding and the causes of overcrowding' (to coin a phrase) and a cynical gesture of politically motivated outreach.

Also, it has to be said that in the context of this paper 'decency' is a remarkably slippery concept. The review of the terms historical use in relation to overcrowding as 'decency through separation of the sexes' and 'adequate space' is of more than academic interest when compared with the new definitions given here. 'Decent homes' are apparently analogous with 'decent neighbourhoods'. This represents a not so subtle shift from the onus on government to ensure that housing is fit for habitation and in sufficient supply to an emphasis on the kinds of 'decent' *behaviour* that will enhance the experience of living in an area (and even in a home) of indeterminate physical quality. It is not proposed that houses should be fit for living in as such, but rather that residents should be the beneficiaries of the government's far less tangible 'liveability' and quality of life criteria; and alternately (or perhaps even simultaneously) subject to the anti-social behaviour dictates of the 'respect' agenda.

These new political priorities are already eroding any notion of 'standards' – other than those that relate to the behaviour of those living in poor housing – by promoting the more arbitrary notion of government's role as that of achieving 'outcomes'. For instance, the proposal to replace the fitness standard with the Housing Health and Safety Rating System (HHSRS) criteria of 'impact on the occupiers' is self-evidently open to interpretation and, therefore, manipulation.

Clearly the definition of overcrowding needs revising from that of the 1935 (and 1985) Housing Act in line with raised expectations of what a 'decent' home is. This is indeed long overdue. But given the paper's concern about aspirations it cannot meet, and its Orwellian work on the word 'decency' we are unclear what this would mean in practice.

It is with much regret and frustration that we note that only in the final section of the paper is it acknowledged that,

Overcrowding cannot be seen as an issue isolated from wider housing policy. It is a symptom of pressure on housing supply in the same way as homelessness and lack of affordability.

Nothing in the preceding pages proposes anything that might relieve this pressure.

Recommendations:

1. The government cannot rely on making existing resources stretch further by revising allocations of social housing or by the farcical policy of encouraging 'under-occupiers' to move out of their homes. Only a house-building programme that meets the needs of the projected populations concerned, together with an interim policy of making existing social housing at least adequate in size and fit for living in, will do.
2. With this in mind we recommend that the government retains and extends the original definition of overcrowding as that which denies 'adequate space' to its habitants, to housing policy *in general*. Though the specific criteria should be revised in line with increased wealth and living standards, it is the opinion of the Future Cities Project that this rather old standard is an important one – not least because it isn't being met seventy years after it was formulated.
3. The 'coordinated approach' advocated in the paper may sound pragmatic and concerned with better partnership working, but it belies an intent to promote unwarranted interventions by housing associations, local authorities etc, in the lives of tenants and home-owners alike, and in the context of incontestable resource constraint. The measure of good policy in this area should not be how joined-up it is or how it impacts on official prescriptions of what constitutes the 'well-being' of those living in overcrowded conditions, but the extent to which those conditions are relieved. Such an approach cannot be resource neutral and requires bold policy and even bolder representations to the Chancellor of the Exchequer. A little more empiricism and a little less emoting should help to achieve this.